

**REMARKS**

Claims 1-10 and 12-27 are pending in this application. Claims 1, 17-19 and 22-26 have been amended and claims 12-14 have been canceled by the present Amendment. Amended claims 1, 17-19 and 22-26 do not introduce any new subject matter.

The present invention relates to a display device. According to an embodiment of the invention, the display device includes at least one wireless transmitter adapted to wirelessly transmit audio signals from at least two input sources to each wireless headphone set of a plurality of headphone sets. The audio signals are transmitted as left and right audio channels, wherein each left audio channel and each right audio channel for each wireless headphone set has a different frequency.

According to an embodiment of the present invention, the display device includes a first wireless transmitter adapted to wirelessly transmit audio signals from the one of two input sources to a first wireless headphone set, and a second wireless transmitter adapted to wirelessly transmit audio signals from another of the two input sources to a second wireless headphone set.

**REJECTIONS UNDER 35 U.S.C. § 103(a)**

Reconsideration is respectfully requested of the rejection of claims 1-9, 15, 16 and 25-27 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,380,978 ("Adams") in view of U.S. Patent No. 5,610,822 ("Murphy").<sup>1</sup>

Reconsideration is also respectfully requested of the rejection of claims 17 and

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<sup>1</sup> The Examiner does not specifically list claim 9 among those claims rejected under 35 U.S.C. § 103(a) as being unpatentable over Adams et al. in view of Murphy, but includes an explanation that Adams et al. and Murphy do not teach the claim 9 limitation. Accordingly, Applicant has interpreted claim 9 as being rejected under 35 U.S.C. § 103(a) as being unpatentable over Adams et al. in view of Murphy.

18 under 35 U.S.C. § 103(a) as being unpatentable over Adams in view of Murphy, as in claim 1, and further in view of U.S. Patent No. 6,301,637 ("Boyden"), claims 12-14 having been canceled by the present Amendment.

Although claims 12-14 have been canceled by the present Amendment, Applicants respectfully submit that the subject matter of claim 14 (i.e., audio signals wirelessly transmitted as left and right audio channels, wherein each left audio channel and each right audio channel for each wireless headphone set has a different frequency) is patentable over Adams in view of Murphy, as in claim 1, and further in view of Boyden. Applicants also respectfully submit that the incorporation of the elements of claim 14 into independent claims 1 and 25 renders claims 1 and 25 and all claims dependent thereon patentable over the cited references.

Further, Applicants respectfully submit that a display device including first and second wireless transmitters adapted to wirelessly transmit audio signals from first and second sources to first and second wireless headphone sets, respectively, as recited in claims 25 and 26, is patentable over Adams in view of Murphy.

**The Cited References Do Not Teach Or Suggest The Use  
Of Different Frequencies For Respective Left And Right  
Audio Channels Of Each Wireless Headphone Set**

In rejecting claims 12-14, the Examiner states that Adams and Murphy "do not teach the display [and] the headphones with left and right audio channels", and that Boyden "teaches left and right audio channels in [a] headset". July 30, 2003 Office Action at 5. Applicants agree with the Examiner that Adams and Murphy fail to teach left and right audio channels. However, although Boyden relates to an audio system having left and right acoustic modules, Applicants respectfully submit that Boyden

contains no teaching or suggestion regarding the use of different frequencies for left and right channels between multiple headsets. Indeed, Boyden relates to a single headset system, wherein a single audio source is, for example, worn on the body of a user.

Unlike an embodiment of the present invention, Boyden fails to address using different frequencies to avoid interference between multiple headsets that may be playing different programs. See specification at page 21, lines 10-19. There is simply no need for this feature in Boyden since Boyden does not contemplate multiple headsets that, for example, allow users to listen to audio from multiple sources.

Further, Adams and Murphy fail to teach or suggest the channel configuration, as recited in amended claims 1 and 25. As admitted by the Examiner, Adams and Murphy fail to disclose the use of the left and right channels. Further, like Boyden, Adams relates to a video system using a single entertainment source and is not concerned with interference between users.

Also, there is no suggestion or teaching in Murphy relating to wireless transmission of audio signals over different frequencies. The system of Murphy is contemplated for use in vehicles used for mass transit, such as aircraft (see Murphy Abstract), where wireless transmission is not necessary and in some cases dangerous. Further, entertainment systems in mass transit vehicles do not use wireless technology because the display devices are commonly found on the seat in front of a passenger and headphones are connectable to a passenger's seat. See, e.g., Murphy Fig. 3.

Therefore, it is respectfully submitted that the cited references, when taken alone or in combination, do not disclose or suggest the left and right channel configuration, as defined in newly amended claims 1 and 25. It is respectfully submitted that it would not

have been obvious to modify Adams, in view of Murphy, to use different frequencies for respective left and right audio channels of multiple wireless headphone set. Further, the addition of Boyden also does not render obvious the channel design, as recited in amended claims 1 and 25.

Therefore, Applicants respectfully submit that an embodiment of the invention including the use of different left and right channels for each headset, as defined in amended claims 1 and 25, is patentable over Adams, in view of Murphy and over Adams in view of Murphy, as in claim 1, and further in view of Boyden. Because claims 2-9, 15-18 and 27 depend from claim 1, claims 2-9, 15-18 and 27 are also submitted to be patentably distinct over the cited references. As such, for at least the reasons described above, Applicants request that the Examiner withdraw the rejection of claims 1-9, 15-18, 25 and 27 under 35 U.S.C. §103(a), claims 12-14 having been canceled.

**The Cited References Do Not Teach Or Suggest A Display Device Including First And Second Wireless Transmitters Adapted To Wirelessly Transmit Audio Signals From First And Second Sources**

The Examiner rejected independent claims 25 and 26 as being unpatentable over Adams in view of Murphy. However, Applicants respectfully submit that the cited references, when taken alone or in combination fail to teach or suggest the use of two wireless transmitters to wirelessly transmit audio signals from first and second sources to first and second wireless headphone sets, respectively, as recited in claims 25 and 26.

As argued above, Adams relates to a video system furnishing entertainment to a single user and is not concerned with transmission to more than one user and interference between users. Adams contains no teaching regarding multiple wireless

transmitters for transmission of programs from more than one source to multiple wireless headphone sets.

The system of Murphy does not cure this deficiency in Adams. Indeed, as argued above, the system of Murphy does not address wireless transmission or the potential problems associated therewith when servicing multiple users. The Murphy system is contemplated for use in vehicles used for mass transit, such as aircraft, where wireless transmission is not necessary and headphones are connectable to a passenger's seat.

Therefore, the combination of Adams and Murphy would not render obvious a first wireless transmitter adapted to wirelessly transmit audio signals from the one of two input sources to a first wireless headphone set, and a second wireless transmitter adapted to wirelessly transmit audio signals from another of the two input sources to a second wireless headphone set, as recited in claims 25 and 26.

Accordingly, Applicants respectfully submit that claims 25 and 26 are patentable over Adams in view of Murphy and request that the Examiner withdraw the rejection of same.

**The Remaining Claims Are Patentable For At Least The Reason That They Are Dependent On Claim 1, Which Is Patentable Over The Cited References**

Reconsideration is respectfully requested of the rejection of claim 10 under 35 U.S.C. § 103(a) as being unpatentable over Adams in view of Murphy, as in claim 1, and further in view of U.S. Patent No. 6,134,223 ("Burke"). Applicants respectfully submit that the amendment made to independent claim 1 renders claim 10 patentable over the cited references.

As argued above, Applicants respectfully submit that Adams, Murphy and

Boyden fail to teach or suggest the audio signals wirelessly transmitted as left and right audio channels, wherein each left audio channel and each right audio channel for each wireless headphone set has a different frequency, as recited in amended claim 1. The addition of Burke also does not render obvious the left and right channels, as recited in amended claim 1.

Burke relates to a method and system for audio and video conferencing and telephony. Burke does not include any disclosure regarding the wireless transmission of audio signals or using different frequencies for left and right audio channels of each respective headset. Furthermore, Applicants respectfully submit that Burke is nonanalogous art due to the differences in structure and function between the Burke system and the embodiments of the present invention. M.P.E.P. § 2141.01(a).

Therefore, Applicants respectfully submit that Adams and Murphy, when taken alone or in combination with Burke, fail to teach or suggest the use of different frequencies for each left and right channel of each wireless headphone set, as recited in amended claim 1.

Accordingly, Applicants respectfully submit that the embodiment of the invention as defined in amended claim 1 is patentable over Adams in view of Murphy, as in claim 1, and further in view of Burke. Because claim 10 depends from claim 1, claim 10 is submitted to be patentably distinct over the cited references. As such, Applicants request that the Examiner withdraw the rejection of claim 10 under 35 U.S.C. §103(a).

Reconsideration is respectfully requested of the rejection of claims 20-24 under 35 U.S.C. § 103(a) as being unpatentable over Adams in view of Murphy, as in claim 1, and further in view of U.S. Patent No. 5,793,413 ("Hylton"). Applicants respectfully submit that the amendment made to independent claim 1 renders claims 20-24

patentable over the cited references.

As argued above, Applicants respectfully submit that Adams, Murphy and Boyden fail to teach or suggest the audio signals wirelessly transmitted as left and right audio channels, wherein each left audio channel and each right audio channel for each wireless headphone set has a different frequency, as recited in amended claim 1. The addition of Hylton also does not render obvious the left and right channels, as recited in amended claim 1.

Hylton relates to large scale video distribution networks capable of providing subscribers with access to multiple information service providers. Hylton fails to teach or suggest wireless transmission of audio signals among multiple users in a vehicle and contains no disclosure regarding the use of different frequencies for left and right audio channels of each respective headset, as recited in amended claim 1. In contrast, Hylton addresses large scale networks such as television, cable and digital satellite networks. Hylton does not address small scale wireless transmission in a vehicle, wherein interference may occur between multiple users in a confined area.

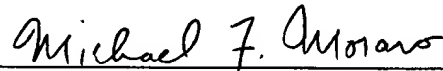
Therefore, Applicants respectfully submit that Adams and Murphy, when taken alone or in combination with Hylton, fail to teach or suggest the use of different frequencies for each left and right channel of each wireless headphone set, as recited in amended claim 1.

Accordingly, Applicants respectfully submit that the embodiment of the invention as defined in amended claim 1 is patentable over Adams in view of Murphy, as in claim 1, and further in view of Hylton. Because claims 20-24 depend from claim 1, claims 20-24 are also submitted to be patentably distinct over the cited references. As such, Applicants request that the Examiner withdraw the rejection of claims 20-24 under 35

U.S.C. §103(a).

An early and favorable reconsideration is earnestly solicited. If the Examiner has any further questions or comments, it is suggested that the Examiner telephone Applicants' Attorney to reach a prompt disposition of this application.

Respectfully submitted,



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